

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 2, 2019

Mr. Melvin Christopher, Vice President
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2019-02-PGE-29-03

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Operations and Maintenance plans, Design and Construction standards, and Part 191 related plans

Dear Mr. Christopher:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F inspection of Pacific Gas & Electric Company's (PG&E) Operations and Maintenance plans, Design and Construction standards, and Part 191 related plans from February 4 through February 8, 2019.

SED's findings are noted in the attached Post-Inspection Written Preliminary Findings (Summary) section of this letter. The Summary reflects only those particular records and procedures that SED reviewed during this inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the Concerns noted in the Summary.

If you have any questions, please contact Ha Nguyen at (213) 576-5762 or by email at Ha.Nguyen@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, reading "Kenneth A. Bruno", is positioned above the typed name.

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Bhavini Shah, PG&E
Dennis Lee, SED
Claudia Almengor, SED
Matt Epuna, SED

Post-Inspection Written Preliminary Findings

Date of Transmittal: 03/15/2019

Dates of Inspection: 02/04/2019 – 02/08/2019

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Operations and Maintenance Plans, Design and Construction Standards, and Part 191 related plans

Assets (Unit IDs): Main Office (Specialized Inspections) (86283)

System Type: GD and GT

Inspection Name: 2019 PG&E O&M

Lead Inspector: Ha Nguyen

Operator Representative: Jaime Hidalgo

Unsatisfactory Results

No Preliminary Findings.

Concerns

1. Procedures: Normal Operating and Maintenance (PRO.SUBLNORMOPS)

Question Text	Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?
References	192.605(a)
Assets Covered	Main Office (Specialized Inspections) (86283 (29))
Issue Summary	The document, Utility Standard Practice (USP) 22, "Safety and Health Program" has been superseded by SAFE-1001S, "Safety and Health Program Standard". The following documents refer to older version and therefore need to be updated.

	TD-4125P-01
	TD-4125P-03
	TD-4430P-02

2. Procedures: Pressure Limiting and Regulating Station (PRO.SUBMOVERPRESS)

Question Text	Does the process require telemetering or recording gauges be utilized as required for distribution systems?
References	192.605(b)(1) (192.741(a), 192.741(b), 192.741(c))
Assets Covered	Main Office (Specialized Inspections) (86283 (29))
Issue Summary	PG&E Procedure TD-4125P-05 references WP4540-01 for maintaining accuracy of pressure recording equipment. WP4540-01 was superseded by TD-4540P-01 and Procedure TD-4125P-05 should be updated to reflect this change.